

Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor
John Etchepare, Director

April 5, 2007

Medicine Wheel/Paintrock Ranger District
Attn: Beth Bischoff
Bighorn NF
604 East Main Street
Lovell, Wyoming 82431

Dear Beth Bischoff:

Following are our comments for the Scoping Notice for the proposed grazing allotment management plan (AMP) revisions within the Beaver Creek Analysis Area located on the Medicine Wheel/Paintrock Ranger District of the Bighorn National Forest (Bighorn NF).

Our comments are specific to our mission: to be dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed project affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

This project will significantly impact grazing permittees, agriculture producers, landowners, and other citizens, as well as our natural resources, in and near this 70,600 acre project area. These impacts need to be included in the analysis.

We encourage USFS officials to work with all permittees and agriculture producers to learn of their concerns and recommendations about this analysis. These folks are intimately familiar with the area under study and possess irreplaceable long-term, on-the-ground knowledge. They understand that it is in their best interests to continue to serve as stewards of the habitat, forage, and rangeland health in these allotments. They will best appreciate the agricultural practices that will be affected. They are particularly aware of the impacts upon wildlife and livestock habitat of the project area. Thus, we strongly recommend USFS officials aggressively address the concerns and recommendations of these stewards during the planning process. Moreover, it is imperative that BLM officials continuously inform all livestock grazing permittees who are directly or indirectly affected of the issues, decisions, and resulting actions regarding these proposed revisions.

Most environmental analyses are woefully deficient in identifying or analyzing social and economic impacts. We appreciate the fact that ranger district staff include numerous and diverse environmental specialists, yet no social and economic analysts. As a result, virtually all environmental analyses ignore or woefully understate the social and economic impacts of livestock grazing upon grazing permittees and the communities they support. We specifically

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suggest that this analysis includes the social and economic impacts upon livestock grazing in and adjacent to the planning area.

Grazing on public lands represents a vital economic value to agriculture producers and to local communities. Impacts on this economic activity, specifically within the affected area and in adjoining areas, need to be included in the study. The loss or impaired ability of livestock grazing operations needs to be evaluated in the analysis.

The true economic impact of livestock grazing upon local communities is often underestimated. Input-Output studies by the University of Wyoming reveal that nearly all livestock in Wyoming are sold out of state, yet nearly all expenditures by Wyoming ranchers are made in nearby communities. This infusion and turnover of out-of-state or new dollars into local communities created by livestock grazing needs to be reflected in the study. More importantly, the analysis needs to capture the impact of the loss of that infusion and turnover by ranching operations which may be impaired by the results of this analysis and any possible AMP revisions.

Throughout Wyoming, ranches are being replaced by housing and industrial developments, resulting in a permanent loss of wildlife habitat, scenic vistas, wide-open spaces, visual beauty, historic rural landscapes, stable rural revenues, and the historic cowboy culture of this state. The area in and around the Bighorn NF has witnessed a continuing and accelerating infusion of developments and residences. These developments arrive with a significant increase in the cost of supporting infrastructure imposed upon federal, state, and county officials. A recent study in Fremont County conducted by the University of Wyoming shows that ranches bring significantly greater revenues into the county than the cost of the county infrastructure needed to support those ranches. Conversely, developments demand costs in county infrastructure support that far outweigh the revenues generated by developments. The study needs to be included in the analysis.

In addition to its economic value, grazing also represents irreplaceable environmental and social values, contributing to the preservation of open spaces, the scenic vistas and visual beauty of the area, and the traditional image of the historic rural landscapes of Wyoming and the West. Any loss of these important environmental, historic, and social values of livestock grazing to users and visitors of the area and residents of impacted communities should be included in the scope of the study and the social impacts analyzed in the analysis.

Congressional mandates, federal statutes, and implementing regulations call for multiple use, and these mandates, statutes, and regulations should be an integral part of the assessments.

Moreover, the Analysis should evaluate the impact of this project upon the Congressional intent expressed in the Federal Land Policy and Management Act of 1976 to manage public lands in a manner that will provide food and habitat for fish, wildlife, and domestic animals. The impacts upon food and habitat for fish and wildlife are usually well documented in National

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Environmental Policy Act documents. The consequences of this project upon food and habitat for domestic animals deserve the same degree of study and documentation.

In fact, grazing is an essential resource management tool to achieve desired environmental objectives in the planning area, including obtaining positive effects upon food and habitat for wildlife and livestock. The analysis needs to include (1) these positive effects of livestock grazing upon the environment and as a tool to achieve environmental objectives and (2) the impacts of any AMP revisions that would limit the ability of livestock grazing to achieve these positive effects. In fact, the study needs to evaluate the opportunities for increasing levels of grazing in the project area.

Peer-reviewed science should underlie decisions and the analysis needs to identify the science that supports the decisions and discussions regarding this project,

Decisions in the proposed plan should allow USFS officials, grazing permittees and company officials the opportunity to work cooperatively and the flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens.

Finally, we want to emphasize that the recently published Big Horn NF Revised Land and Resource Management Plan provides for continued livestock grazing, while maintaining healthy plant communities and wildlife populations. A Supplemental Information Report to that revised plan further emphasized that permitted and authorized grazing levels will be determined by implementing Revised Plan direction through Allotment Management Plans and Annual Operating Plans. Thus, the AMP revisions for the Beaver Creek Analysis Area is of crucial importance and deserves the close scrutiny of this department and grazing permittees

In conclusion, we appreciate the opportunity to comment on the scope of the proposed actions, we encourage continued attention to our concerns, and we look forward to hearing about and being involved in proposed actions and decisions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Etchepare", with a stylized flourish at the end.

John Etchepare
Director

cc: Governor's Planning Office
Wyoming Game and Fish Department

